

**EPA Jacket 9386-49**

**Vol.1 Part 1**



RE: 9386-49 kemira reg notice, formation of nitrogen trichloride  
Snyder Colleen  
to:  
Tracy Lantz  
04/24/2012 07:38 AM  
Cc:  
Velma Noble  
Hide Details  
From: Snyder Colleen <Colleen.Snyder@kemira.com>

To: Tracy Lantz/DC/USEPA/US@EPA

Cc: Velma Noble/DC/USEPA/US@EPA

2 Attachments



image001.gif image002.gif

Hi Tracy! Hope all is well.

Please keep this action open. We do still wish to meet however; we are so limited with time at the moment. That is why I asked to see if your team was available in June when we will be in DC for the Antimicrobial Workshop. I will prepare and send you an agenda and possible suggested times soon.

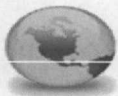
Colleen

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**From:** Tracy Lantz [mailto:Lantz.Tracy@epamail.epa.gov]  
**Sent:** Friday, April 20, 2012 5:53 PM  
**To:** Snyder Colleen  
**Cc:** Velma Noble  
**Subject:** Fw: 9386-49 kemira reg notice, formation of nitrogen trichloride

I don't think I have heard back from you regarding this discussion on the nitrogen trichloride formation. This is still on my to do list. Is this a conversation we can have via conference call? If so, I would like to go ahead and get this call scheduled. Please provides some times that you are available in the next three weeks for a conference call.

Thanks,



**RE: 9386-49 kemira reg notice**  
**Snyder Colleen to: Tracy Lantz**

01/06/2012 03:06 PM

From: Snyder Colleen <Colleen.Snyder@kemira.com>  
 To: Tracy Lantz/DC/USEPA/US@EPA

2 attachments



Fennosurf 586 (LABEL).docLTR -Cover Ltr to Conditional Registration 06JAN2012.docx

*try to do as  
 conf. call - Penn's out  
 week of 1/16  
 how technical?  
 invite Najm / and  
 Bill / Tim Dole  
 room*

Thank you for your response Tracy.

*Set up: Conference call 8671*

I have submitted the Final label for 9386-49 to Document Processing and have attached a copy here for your review.

*8621*

Regarding the Agency's concern of the formation of nitrogen trichloride; Kemira is preparing to submit to the Agency data and rationale which will clarify the reaction of sodium hypochlorite and ammonia. Preparing the monochloramine at a pH over 12 presents some technical issues. Data will show that 100% conversion, with no nitrogen trichloride formation, occurs at a lower pH. We would like the opportunity to discuss this with you prior to formally submitting for review. I will contact you next week to see when you are available.

Thank you again for your continued support and availability.

-----Original Message-----

From: Tracy Lantz [mailto:Lantz.Tracy@epamail.epa.gov]  
 Sent: Thursday, January 05, 2012 4:27 PM  
 To: Snyder Colleen  
 Subject: RE: 9386-49 kemira reg notice

We have concerns about the formation of nitrogen trichloride in the reaction of sodium hypochlorite and ammonia. In order to minimize the formation of the nitrogen trichloride, it is our understanding that the pH of the solution of sodium hypochlorite and ammonia must be maintained at 12 or higher. This is the reason we added the statement:

This product must be applied in conjunction 1) an EPA registered sodium hypochlorite product (12.5% a. i.) and 2) a closed delivery system at a pH of >12 to form monochloramine, a slower acting less aggressive oxidizing microbiocide. The products are added to dilution:"

to your label. If you have data to show that our understanding of this reaction is not correct please submit this data to the Agency for review. Please format any data to be in agreement with PR Notice 86-5 so that we may assign an MRID.

Thanks,  
 (Embedded image moved to file: pic30245.jpg)

From: Snyder Colleen <Colleen.Snyder@kemira.com>  
 To: Tracy Lantz/DC/USEPA/US@EPA



Date: 01/04/2012 03:16 PM  
Subject: RE: 9386-49 kemira reg notice

Thanks Tracy.

-----Original Message-----

From: Tracy Lantz [mailto:Lantz.Tracy@epamail.epa.gov]  
Sent: Wednesday, January 04, 2012 3:15 PM  
To: Snyder Colleen  
Subject: RE: 9386-49 kemira reg notice

I am checking with our scientists for clarification on this issue.

From: Snyder Colleen <Colleen.Snyder@kemira.com>  
To: Tracy Lantz/DC/USEPA/US@EPA  
Date: 01/04/2012 02:41 PM  
Subject: RE: 9386-49 kemira reg notice

Hi Tracy,

Item d. of the attached registration document states in full sentence: "This product must be applied in conjunction with an EPA registered sodium hypochlorite (12.5% a.i.) and a closed delivery system at a pH of  $\geq 12$  to form monochloramine,..."

May I request that this be tweaked to ensure the reader understands that the pH of  $\geq 12$  is referring to the sodium hypochlorite?

Thank you for your consideration,

Colleen M Snyder  
Product Safety Expert, Biocides- North America, Global Tissue Specialties & Felt Cleaners Tel +678 819 4566|Mobile  
+412-780-7913|Colleen.Snyder@kemira.com

Kemira Chemicals, Inc 1000 Parkwood Circle, Suite 500, Atlanta, GA 30339 USA  
www.kemira.com | www.waterfootprintkemira.com

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-----Original Message-----

From: Tracy Lantz [mailto:Lantz.Tracy@epamail.epa.gov]  
Sent: Tuesday, January 03, 2012 2:23 PM  
To: Snyder Colleen  
Subject: Fw: 9386-49 kemira reg notice

Happy New Year!!

(Embedded image moved to file: pic22632.jpg)

----- Forwarded by Tracy Lantz/DC/USEPA/US on 01/03/2012 02:20 PM -----

From: cts/cts/QP/USEPA/US@EPA  
To: Tracy Lantz/DC/USEPA/US@EPA  
Date: 01/03/2012 02:17 PM  
Subject: 9386-49 kemira reg notice

Please open the attached document. This document was digitally sent to you using an HP Digital Sending device. (See attached file: [Untitled].pdf) [attachment "[Untitled].pdf" deleted by Tracy Lantz/DC/USEPA/US]

*Product Safety*

06 January 2012

Velma Noble  
PM #31  
US EPA  
Office of Pesticide Programs  
Antimicrobial Division (7504P)  
Document Processing Desk (REG)  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

**RE: Conditional Registration Label Changes: OPP Decision No D445675; EPA Reg. No. 9386-49**

Dear Ms. Noble:

Please find attached the revised label for FENNOSURF 586 (EPA Reg. # 9386-49. Specifically enclosed is:

- Three (3) copies Final printed label
- One (1) copy Conditional Registration Letter dated December 21, 2011

Also requested as part of registration condition, is a one year product specific storage and corrosion characteristics study. This study was initiated on or about July 17, 2011. I have provided interim values below with progress reports and Final study to be submitted to the Agency.

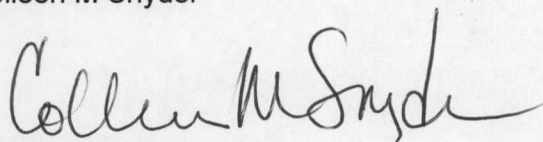
**PRODUCT IDENTIFICATION: FENNOSURF 586; Batch # 1**

STORAGE STABILITY AND CORROSION CHARACTERISTICS  
EPSL Study number: 32511

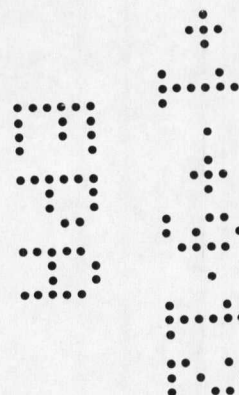
Results: Composition of the test substance as determined by Product Safety Labs  
Time: initial: Ammonia – 7.83%  
3 months: Ammonia – 7.82%

Please feel free to contact me directly should you have any questions.

Colleen M Snyder




Product Safety Expert







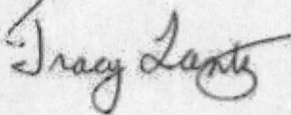
**Re: EPA Reg# 9386-49 FENNSURF 586**   
Tracy Lantz to: Snyder Colleen

01/11/2012 09:57 AM

From: Tracy Lantz/DC/USEPA/US  
To: Snyder Colleen <Colleen.Snyder@kemira.com>

Your reg. notice and label was sent to the old address as that is what I had in the file for this application. It was sent back to us and I will now send it to the correct address.

Thanks,



**Tracy Lantz  
Regulatory Team 31  
Antimicrobials Division  
U. S. Environmental Protection Agency  
Phone: (703) 308-6415  
FAX: (703) 308-8481**

Snyder Colleen

Good morning Tracy, Sorry I missed your call.

01/11/2012 08:26:11 AM

From: Snyder Colleen <Colleen.Snyder@kemira.com>  
To: Tracy Lantz/DC/USEPA/US@EPA  
Date: 01/11/2012 08:26 AM  
Subject: EPA Reg# 9386-49 FENNSURF 586

Good morning Tracy,

Sorry I missed your call.

Kemira submitted to the Agency an address change last September (2011). Our new address is 1000 Parkwood Circle, Atlanta GA 30339.

Colleen M Snyder  
Product Safety Expert, Biocides- North America, Global Tissue Specialties & Felt Cleaners  
Tel +678 819 4566 | Mobile +412-780-7913 | Colleen.Snyder@kemira.com

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**Summary Information For  
Company 9386, KEMIRA CHEMICALS, INC.**

**Company No:** 9386  
**Company Name:** KEMIRA CHEMICALS, INC.  
**Division Name:**  
**Office Name:**  
**Branch Name:**  
**Contact Name:** COLLEEN M. SNYDER  
**Contact Phone:** (678) 819-4566  
**Agent Name:**  
**Official Address:** 1000 PARKWOOD CIRCLE, SUITE 500  
ATLANTA, Georgia 30339  
UNITED STATES  
**Date of Current Update:** 08-Aug-2011 ← updated since appl. submitted for review  
**Reason for Current Update:** Letter from Company

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Last updated on December 22, 2009, Version 1.10  
<https://prism.epa.gov/pls/prism10p>

Explore Registrations

Reg Number: 9386-UO

Reg. Type: Product Registration - Section 3

Status: Under Review (25-Feb-2011)

Name: FENNOSURF 586

<View Registration Details>

( New Receipts )

S:	Submission Type	OPP Rec'd Date	Resubmission	Description
<input checked="" type="radio"/> 904903	Miscellaneous Receipt	06-Oct-2011	<input type="radio"/> Yes <input checked="" type="radio"/> No	Preliminary analysis
<input checked="" type="radio"/> 908365	New Registration	05-Dec-2011	<input checked="" type="radio"/> Yes <input type="radio"/> No	product chemistry data

...Decisions...

Data Requirements

D: Pending; 445675; 9386-UO;A532;UNREGISTE

75-Day Letters

S: 890858 2/22/2011; New Registration; 93:

Decision Sequence: 445675

Action: A532

UNREGISTERED SOURCE OF ACTIVE INGREDIENT;N

Number: 9386-UO

Original Decision:

Name: FENNOSURF 586

Decision Status: PENDING (28-Feb-2011)

Organization Owner: AD / RMB1

Team Owner: RM 31

FFS Start Date 05-Apr-2011

Received by Risk Manager:

Due Date 05-Aug-2011

FFS Amt Expected: \$4,631

Negotiated Due Date: 23-Dec-2011

FFS Amt Refunded:

FFS Amt Received: \$4,631

Comments:

D 445675  
S 890858 3/15/11  
meeting w/  
Dennis + Velma

company:  
Kemira

product:

7.95% Fenno surf 586

9386-00  
A532 paid 4631.00



7/14/11 Sent 75 day letter.

8/17/11 Internal premeeting to discuss proposed chemistry data

8/22/11 Meeting Kenira to discuss fix

~~8/26/11~~ As per Dennis sent product chemistry data to PBS  
9/26/11 for review. we are still waiting for  
chem data on unregistered source.

9/22/11 emailed 75 day letter

10/11/11 Velma + Tracy called Colleen @ both #'s + left messages  
She needs to confirm that data was sent to Front End  
and needs to renegotiate. If data here + rec MRID  
by 10/23 she only needs to renegotiate for 60 additional  
days.

10/12/11 Called both # again + left messages

10/13/11 Confirm call w/ Colleen + Velma her data went to front end  
on 10/6/11. Velma indicated that we need additional time for  
review. we need a total of 120 days for review.

We need extension of 60 more days beyond ~~12/23~~ 12/23/11.  
Sounds like she just sent us the 5 batch ~~data~~ preliminary  
analysis on the end use product. ~~we~~

She will  
send  
renegotiation  
Velma said - once we rec'd data w/ MRID we will put that  
review out ~~then~~ discuss w/ Dennis as to whether there are  
still outstanding data requirements + get back to her.